

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GRIFOLS, S.A. and GRIFOLS SHARED
SERVICES NORTH AMERICA, INC.,

Plaintiffs,

v.

DANIEL YU, an individual, GOTHAM CITY
RESEARCH LLC, GENERAL INDUSTRIAL
PARTNERS LLP, CYRUS DE WECK, an
individual, JOHN DOES 1-10, and XYZ
CORPORATIONS 1-10,

Defendants.

No.: 1:24-cv-00576-LJL

**STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING
SCHEDULE ON DEFENDANTS'
MOTION FOR LEGAL FEES**

Plaintiffs Grifols, S.A. and Grifols Shared Services North America, Inc. (collectively, “Grifols”) and Defendants Daniel Yu, Gotham City Research, LLC, General Industrial Partners, LLP, and Cyrus De Weck (collectively, “Defendants”) (together, the “Parties”), through their undersigned counsel, hereby stipulate and agree, subject to the approval of the Court, to the following:

WHEREAS, on January 7, 2025, the Court granted Defendants leave to file a motion seeking legal fees pursuant to N.Y. Civ. Rights Law § 70-a(1) (the “Motion”) by no later than January 21, 2025 (ECF No. 40);

WHEREAS, counsel for Defendants requires additional time to prepare the Motion;

WHEREAS, no previous extensions to this briefing schedule have been sought;

IT IS THEREFORE, HEREBY STIPULATED AND AGREED by and between the Parties,
that:

1. The following briefing schedule will apply to Defendants' Motion:

Event	Deadline
Defendants' Motion	January 31, 2025
Grifols' Opposition	February 21, 2025
Defendants' Reply	February 28, 2025

IT IS SO STIPULATED.

Dated: January 17, 2025

Respectfully submitted,

PROSKAUER ROSE LLP

/s/ Peter D. Doyle

Peter D. Doyle
Jeff Warshafsky
William T. Walsh, Jr.
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
Telephone: (212) 969-3000
pdoyle@proskauer.com
jwarshafsky@proskauer.com
wwalsh@proskauer.com

*Counsel for Plaintiffs
Grifols, S.A. and Grifols
Shared Services North
America, Inc.*

**MILLER KORZENIK
SOMMERS RAYMAN LLP**

/s/ David Korzenik

David S. Korzenik
Gillian Vernick
The Paramount Building
1501 Broadway, Suite 2015
New York, NY 10036
Telephone: (212) 752-9200
dkorzenik@mkslex.com
gvernick@mkslex.com

*Counsel for Defendants
Daniel Yu, Gotham City
Research LLC, General
Industrial Partners, LLP and
Cyrus de Weck.*

DATED: January ___, 2025

SO ORDERED:

Hon. Lewis J. Liman, U.S.D.J.